

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION

OPIATE LITIGATION

*This document relates to:*

Track Three Cases

MDL 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF M. MICHELLE CARRERAS IN SUPPORT OF PLAINTIFFS' RESPONSE  
IN OPPOSITION TO DEFENDANTS HBC SERVICE COMPANY AND GIANT EAGLE,  
INC.'S MOTION FOR SUMMARY JUDGMENT, AND, ALTERNATIVELY, PLAINTIFFS'  
SHOWING PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 56(D)**

Pursuant to 28 U.S.C. § 1746, I, M. Michelle Carreras, hereby declare as follows:

1. I am an attorney at the Lanier Law Firm P.C., trial counsel for Plaintiffs in the above-captioned action.

2. I submit this Declaration on behalf of Plaintiffs in support of their Response in Opposition to Defendants HBC Service Company and Giant Eagle, Inc.'s Motion for Summary Judgment, and, Alternatively, Plaintiffs' Showing Pursuant to Federal Rule of Civil Procedure 56(d) (the "Response") and for the purpose of transmitting to the Court true and correct copies of the documents attached hereto.

3. The table below reflects the documents attached to Plaintiffs' Response, and each listed document is a true and correct copy thereof.

Ex. 1	Excerpts from CT1 Plaintiffs' Memorandum of Law in Support of Motion for Partial Summary Adjudication that Defendants Did Not Comply with Their Duties Under the Federal Controlled Substances Act to Report Suspicious Opioid Orders and Not Ship Them (Corrected) [Dkt. #3015-1], dated June 28, 2019.
Ex. 2	CT1 Plaintiffs' Memorandum in Opposition to Defendant HBC's Motion for Summary Judgment [Dkt. #3009-1], dated July 31, 2019.

Ex. 3	Excerpts from CT1 Plaintiffs' Consolidated Memorandum in Opposition to Defendants' Motion for Summary Judgment on Proof of Causation [Dkt. #3002-1], dated July 31, 2019.
Ex. 4	Excerpts from CT1 Consolidated Reply Memorandum in Further Support of Plaintiffs' Motions for Partial Summary Adjudication with Respect to the Controlled Substances Act [Dkt. #3017-1], dated August 16, 2019.
Ex. 5	Exhibit 12 to the 12/13/18 deposition of James Tsipakis (P-HBC-0012).
Ex. 6	Exhibit 22 to the 12/13/18 deposition of James Tsipakis (P-HBC-1033).
Ex. 7	P-HBC-1024 (HBC_MDL00030064-0069).
Ex. 8	Exhibit 14 to the 12/13/18 deposition of James Tsipakis (P-HBC-1032).
Ex. 9	Exhibit 2 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01359).
Ex. 10	Exhibit 20 to the 12/13/18 deposition of James Tsipakis (P-HBC-1023).
Ex. 11	P-09693 (HBC_MDL00086642-6644).
Ex. 12	P-HBC-1026 (HBC_MDL00047152-7155).
Ex. 13	Excerpts from Appendix 10 to Craig McCann's 5/4/21 Supplemental Expert Report.
Ex. 14	Exhibit 2 to the 3/17/21 deposition of James Tsipakis (P-HBC-01348).
Ex. 15	Excerpts from Exhibit 1 to the 4/16/21 deposition of Emily Mooney (P-HBC-01356).
Ex. 16	Exhibit 2 to the 3/8/21 deposition of George Chunderlik (P-HBC-00026).
Ex. 17	Exhibit 1 to the 3/17/21 deposition of James Tsipakis (P-HBC-00028).
Ex. 18	P-09523 (HBC_MDL00059779-9781).
Ex. 19	Errata to 4/16/2021 deposition of Emily Mooney.
Ex. 20	P-09555 (HBC_MDL00191129-1130).
Ex. 21	Exhibit 15 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01282).
Ex. 22	Exhibit 5 to the 3/8/21 deposition of George Chunderlik (P-HBC-00023).
Ex. 23	Exhibit 6 to the 3/8/21 deposition of George Chunderlik (P-HBC-00024).

Ex. 24	Excerpts from Giant Eagle Inc.'s Answers and Objections to Topic Nos. 3-9 in Plaintiffs' Notice of Deposition Pursuant to Rule 30(b)(6) to Defendant Giant Eagle, dated February 22, 2021.
Ex. 25	Excerpts from P-HBC-00037 (GE_TL00011878-1882, 1895-1897, 1916, 1919).
Ex. 26	P-09545 (HBC_MDL00191120-1121).
Ex. 27	P-09546 (HBC_MDL00191122-1124).
Ex. 28	P-09550 (HBC_MDL00191127-1128).
Ex. 29	P-09583 (HBC_MDL00191181-1183).
Ex. 30	P-14631 (HBC_MDL00191162-1163).
Ex. 31	P-14632 (HBC_MDL00191164-1166).
Ex. 32	P-14633 (HBC_MDL00191167-1168).
Ex. 33	P-14634 (HBC_MDL00191178-1179).
Ex. 34	Excerpts from Exhibit 11 to 6/11/21 deposition of Craig McCann (Appendix 14).
Ex. 35	Exhibit 11 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01342).
Ex. 36	Exhibit 8 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01284).
Ex. 37	Exhibit 9 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01279).
Ex. 38	Exhibit 10 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01299).
Ex. 39	Exhibit 12 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01340).
Ex. 40	Exhibit 17 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01298).
Ex. 41	Exhibit 13 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01300).
Ex. 42	Exhibit 14 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01308).
Ex. 43	Excerpts from Exhibit 18 to the 3/5/21 deposition of Richard Shaheen (P-GEN-00150).
Ex. 44	Excerpts from Exhibit 19 to the 3/5/21 deposition of Richard Shaheen (P-GEN-00148).

Ex. 45	Excerpts from Exhibit 20 to the 3/5/21 deposition of Richard Shaheen (P-GEN-00149).
Ex. 46	Exhibit 21 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01296).
Ex. 47	Exhibit 13 to the 12/13/18 deposition of James Tsipakis (P-GEN-0003).
Ex. 48	Exhibit 4 to the 3/5/21 deposition of Richard Shaheen (P-HBC-01316).
Ex. 49	Errata to the 6/10/21 deposition of James Rafalski.
Ex. 50	Excerpts from Exhibit 5 to 6/11/21 deposition of Craig McCann (Appendix 8).
Ex. 51	Exhibit 14 to the 1/16/19 deposition of George Chunderlik (P-HBC-01198).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on August 18, 2021.

/s/ M. Michelle Carreras

M. Michelle Carreras